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ABSTRACT

Critics of the Safe and Drug-Free Schools and Communities Act (SDFSCA) point to both structural and substantive failures to explain the program's ineffectiveness. Moves toward reauthorization in Congress create the opportunity to consider needed reforms. Reform options should target those students most in need, ensure effective implementation, promote evaluation, require accountability, improve program capacity, and constrain administrative costs. Chapter 1, "Introduction," reviews the societal and legislative trends culminating in passage of the SDFSCA. Chapter 2, "Assessment," critically examines the program, reviewing such weaknesses as stagnant budgets, poor distribution of funds, vague goals, and a lack of coordination with other programs. Recent changes and new guidelines have begun to improve program effectiveness. Chapter 3, "Changing the Program," offers criteria to use in evaluating proposed reforms and considers a recent Clinton-era reform effort. Chapter 4, "Conclusion and Recommendations," suggests that combining drug prevention and antiviolence efforts under one program should be reconsidered. Specific recommendations for reforms include changing the within-state allocation formula to better reflect district capacities, replacing formula with direct federal grants, and creating requirements for local and state efforts. Any effective reform will require that the federal government stimulate greater local capacity and authority. (Contains 18 references.) (TEJ)

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Peter Reuter

P. Michael Timpane

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Peter Reuter

P. Michael Timpane

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PREFACE

This report synthesizes the findings of a review of the structure and performance of the Safe and Drug-Free Schools and Communities Act (SDFSCA) and assesses options for strengthening it. As part of this study, a conference was held at which practitioners, researchers, and government officials considered the findings and conclusions presented in three commissioned papers, the proceedings of focus groups of knowledgeable practitioners in two school districts, and a review of the literature describing the program established by SDFSCA and its performance to date.

A companion volume (MR-1328/1-EDU, *Options for Restructuring the Safe and Drug-Free Schools and Communities Act: Report with Background Papers and Focus Group Summary*, by Peter Reuter et al., 2001) contains the full set of project outputs. Both reports should be of interest to federal officials and legislators involved in the impending reauthorization of the SDFSCA, as well as to individuals concerned with the implementation of drug and violence prevention programs in schools. The project was sponsored by the U.S. Department of Education, and the work was performed within RAND's Drug Policy Research Center.

THE RAND DRUG POLICY RESEARCH CENTER

The Drug Policy Research Center, a joint endeavor of RAND Criminal Justice and RAND Health, was established in 1989 to conduct the empirical research, policy analysis, and outreach needed to help community leaders and public officials develop more effective strategies for dealing with drug problems. The Center builds on a long tradition of RAND research characterized by an interdisci-

plinary, empirical approach to public policy issues and rigorous standards of quality, objectivity, and independence. The Ford Foundation and other foundations, as well as government agencies, corporations, and individuals, support the Center. Dr. Audrey Burnam and Dr. Martin Iguchi codirect the Drug Policy Research Center.

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SUMMARY

The Safe and Drug-Free Schools and Communities Act (SDFSCA) was enacted in the mid-1980s in response to nationwide fears of increasing cocaine use among adolescents. The Act provides for a $600-million-per-year program of grants to states, which pass the money on to school districts for programs aimed at reducing school violence and drug abuse.

The SDFSCA program has been criticized for both structural and substantive failures: Under the Act, the formula by which money is disbursed does not focus on the schools most in need of help, and it spreads the money too thinly. The very broad guidelines for expenditure permit schools to use the funds for a variety of locally chosen programs, which are rarely based on proven models; the guidelines also prevent the federal government from influencing the distribution of monies between drug and violence prevention. Thus the legislation gives the federal government limited ability to foster effective programs. The SDFSCA program has not been credibly evaluated, but it is widely thought to have accomplished little.

The program has, however, improved in recent years; for example, it has strengthened school-level management and encouraged cooperation across federal funding streams. Nevertheless, it remains severely constrained by a lack of authority, a weak research base on prevention, and an emphasis on curriculum innovation rather than basic changes in classroom practices.

Congress is currently deliberating reauthorization of the Act, providing an opportunity for much-needed reform. We propose the follow-

ing six criteria by which reform options should be judged. Reforms should

- Target schools and children most in need.
- Ensure the implementation of effective programs.
- Promote meaningful evaluation.
- Require accountability.
- Improve program capacity.
- Keep administrative costs low.

The Clinton and Bush administrations have both offered proposals for reform of the program. The Bush administration has proposed consolidating the program with an after-school learning program but has not yet offered any specifics for further analysis. The Clinton administration's proposal calls for better targeting, an enhanced state role in competition for awards, increased emphasis on knowledge-based programs, and thorough evaluation. This proposal moves in the right direction, but it falls short on several criteria.

We believe that the Clinton administration's proposal could be strengthened in three ways. First, the SDFSCA program should be given more authority for capacity-building in the form of teacher training, research, and demonstrations. Second, even tighter targeting is required—under the proposal, the grants to most local districts will still be too small to do much good. Establishing a minimum size for grants (per pupil and per district) and encouraging small school districts to form coalitions could help solve this problem. Provisions for state or local matching funds are another option that would have the same effect. Third, the proposed evaluation requirement goes too far: For programs receiving grants of less than $25,000, the requirement will impose unacceptably high administrative costs. Instead, the federal government should undertake regular national evaluations of program effectiveness, as it has in other educational areas.

There is near-consensus that the current SDFSCA program structure is profoundly flawed; we are unaware of anyone who will explicitly defend it. Yet the problems addressed by the program are so serious and widespread that the federal government cannot reasonably af-

ford to abandon its commitment. Of the few proposals for reform that have been offered, that of the Clinton administration is the only one currently being discussed, and it addresses only some of the ways in which the program could be improved. If the SDFSCA program is to survive and flourish, it must become more demonstrably effective at reducing school-related drug use and violence.

Chapter One

INTRODUCTION

This report synthesizes the results of a RAND assessment of the federal Safe and Drug-Free Schools and Communities Act (SDFSCA), the renewal of which Congress will consider this year. We analyze a proposal submitted by the Clinton administration for reform of the SDFSCA program, and we suggest additional steps that might be taken to improve the program. The Bush administration has also submitted an initial proposal to consolidate the SDFSCA program with the 21st Century Learning Centers program. This proposal places seemingly greater emphasis on safety and violence prevention and on after-school programs, but few details are yet available.

Over the past decade, violence in American schools has declined substantially and persistently to a level that, by many measures, makes schools safer than the other places in which children spend time. Children face a homicide risk of 0.45 per 100,000 person-years in school, compared with 20 per 100,000 person-years outside school (Sherman, 2001). Rates of violent injury, as reported by high school seniors, have fluctuated but have shown no clear trend over the past decade. Nonetheless, intense concern about schools' ability to protect children has been generated by the tragic mass killings at a few schools, in particular, the incident at Columbine High School in Littleton, Colorado. Impressions formed by these incidents have also been exacerbated by evidence of high levels of routine violence against both pupils and teachers in and around many urban schools.

Drug use among high school students is also a cause of continuing concern. In 1986, 5 percent of high school seniors reported having

used marijuana daily in the previous 30 days.[1] That proportion fell steadily through 1992 to 2 percent but then rose again sharply. In 1997, the rate of daily marijuana use among high school seniors reached 6 percent—experimentation with marijuana had again become normative behavior. Use of other drugs has also become more widespread, and some evidence suggests that children are beginning drug use at a younger age. The causes of the changes in drug use remain unknown. While it is clear that shifts in attitude have been the proximate cause of the change in prevalence (Johnston, O'Malley, and Bachman, 1998), there is little understanding of the reasons behind these shifts.

These impressions and trends have contributed to broad political support for the SDFSCA. The Act was passed in 1986 primarily to foster school-based efforts to prevent drug abuse, and funding has been provided for its objectives annually since then. In 1994, violence prevention was added to the Act's stated purposes. Although there are numerous federal government programs aimed at solving problems of youth violence and drug abuse, the SDFSCA is unique in its focus on schools, where it is the principal resource for programs addressing safety, violence, and drug abuse.

The SDFSCA mandates disbursement of money primarily through grants to states, allocated according to population. State education departments receive 80 percent of the funds for disbursement to school districts (see Figure 1); 70 percent of that money is distributed on the basis of student enrollment, and the remaining 30 percent on the basis of need. The governor of each state can disburse the remaining 20 percent of the state's allotment to other organizations that provide prevention activities, such as community organizations or programs serving students with special needs. The U.S. Department of Education (ED) also distributes some discretionary funds under the SDFSCA. These funds, which comprise from 5 to 20 percent of the total disbursed under the Act, are often used for demonstration programs, sometimes in collaboration with other federal agencies such as the Center for Mental Health Services or the Office of Juvenile Justice and Delinquency Prevention.

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[1]The information in this paragraph is drawn from *Monitoring the Future*, an annual survey of 8th, 10th, and 12th grade students (Johnston, O'Malley, and Bachman, annual).

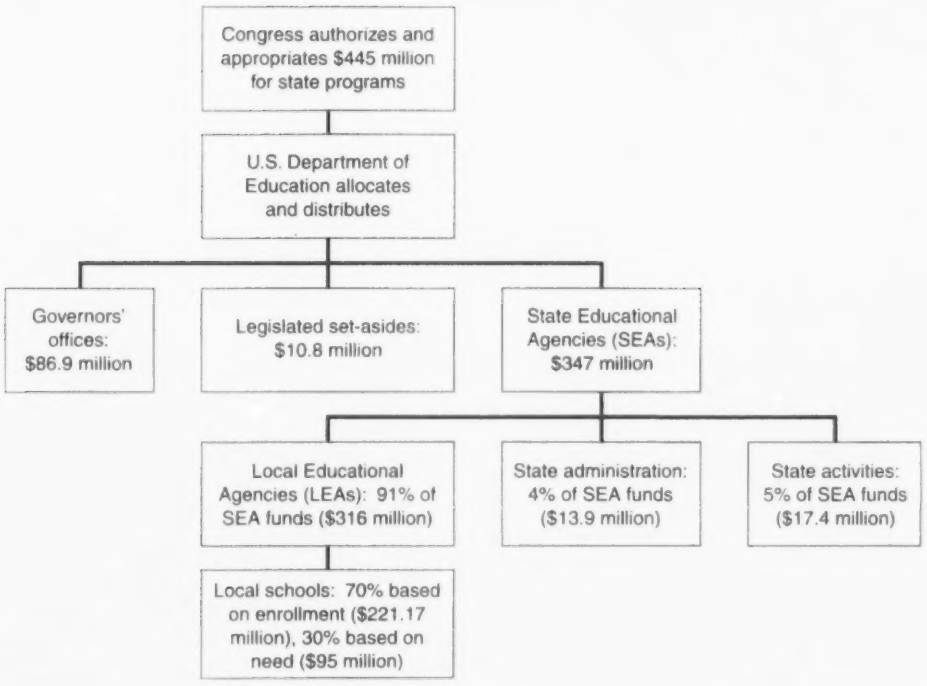
Congress authorizes and appropriates $445 million for state programs
U.S. Department of Education allocates and distributes
Governors' offices: $86.9 million
Legislated set-asides: $10.8 million
State Educational Agencies (SEAs): $347 million
Local Educational Agencies (LEAs): 91% of SEA funds ($316 million)
State administration: 4% of SEA funds ($13.9 million)
State activities: 5% of SEA funds ($17.4 million)
Local schools: 70% based on enrollment ($221.17 million), 30% based on need ($95 million)

Figure 1—Disbursement of SDFSCA Funds to States, FY 00

Schools use a great variety of methods for preventing drug use and preventing or controlling violence. Curricular offerings are the most common approach, but many schools also provide one-on-one counseling by professionals and peers, as well as recreational, enrichment, and leisure activities; many also set explicit norms and rules for behavior.[2] In addition, schools invest in policing activities, including the use of metal detectors.

For many years, the SDFSCA program has been criticized widely on both structural and programmatic grounds. Critics charge that the program fails to target high-need communities and schools; provides minuscule levels of per-pupil support and local programs of insignificant size; shows little or no evidence of effectiveness in reducing drug use or violence; and embodies confusion of purposes among drug prevention, violence prevention, and school safety. In addition,

[2]See Gottfredson (1997) for a recent inventory of approaches.

the program has been accused of serving as a fig leaf for politicians who want to appear to have done something about the problems of drug abuse and violence at schools but who also regularly attack each other across party lines for the program's deficiencies.

To help inform congressional deliberations on the SDFSCA's renewal, the Department of Education asked RAND's Drug Policy Research Center to examine the problems and assess options for improvement. As part of the study, RAND commissioned three analyses of school drug and violence prevention and prepared a background paper describing the history and development of the SDFSCA program. Two focus groups were conducted with teachers and practitioners on the drug and violence problems in their schools and on their experiences with the program in their districts. These activities were preparatory to a two-day conference held in July 1999, which was attended by programmatic and policy leadership from the ED, classroom teachers and local program operators, high-level representatives with drug and violence prevention responsibilities in the departments of Justice and Health and Human Services, and prominent researchers and policy analysts.

The commissioned papers, a summary of the focus groups, and the background paper are contained in a companion volume.[3] This report draws on those materials as well as the discussions at the conference to present a fresh analytical perspective on the SDFSCA program. Chapter Two examines the program's problems. Chapter Three sets out some criteria for assessing options for reform and uses them to evaluate a reform proposal put forth by the Clinton administration. It also identifies and discusses some further directions in which reform might proceed. Our conclusions are summarized in Chapter Four.

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[3]Peter Reuter et al., *Options for Restructuring the Safe and Drug-Free Schools and Communities Act: Report with Background Papers and Focus Group Summary*, MR-1328/1-EDU, 2001.

Chapter Two

ASSESSMENT

Many critics agree that the SDFSCA program is deeply flawed and needs restructuring to encourage more-effective programs, efficient oversight, and better targeting of funds.[1] This chapter summarizes various issues identified in our literature review or cited by focus group and conference participants. Some of these issues have proved problematic in the SDFSCA program's ability to promote safe, drug-free schools; some constrain programmatic change. The chapter concludes with a brief review of some recent improvements in the program.

BUDGETARY ISSUES

The SDFSCA program's overall problems are reflected in its lack of growth over the past decade. In 1990, the SDFSCA program accounted for more than 5 percent of federal drug control expenditures. While the drug control budget expanded substantially over the next seven years, funding for the program actually decreased—its share of the total fell to less than 3 percent. This is particularly striking in view of bipartisan support for prevention programs and rising levels of overall federal spending on education. The SDFSCA program's share of the total federal drug prevention budget is likewise decreasing, having fallen to 26 percent in 1999, compared to 40 percent in 1991 (Office of National Drug Control Policy, 1999).

[1] An excellent assessment of the current program is given in Office of National Drug Control Policy Director Barry McCaffrey's testimony before Congress on the Clinton administration's proposal for changes (McCaffrey, 1999).

Because SDFSCA money is distributed at both state and federal levels primarily through enrollment- and population-based formulas, nearly all schools, rich or poor, get something.[2] As a result, much of the funding goes to districts with modest drug and safety problems or with the means to finance their own efforts. Schools that have serious problems and very constrained budgets receive far too little. Moreover, the current allocation formula spreads the money so thinly ($8 per student and less than $10,000 for most districts per year) that program effects can be no more than modest, and local attempts to evaluate the effects are unaffordable. The programs funded by such minuscule amounts are rarely taken seriously by schools.

Federal funding for drug and violence prevention programs under the SDFSCA is not simply a replacement for other sources of revenue, e.g., state or school funding. State-level initiatives have provided limited support, despite the promulgation in 1989 of National Education Goal No. 6 (now No. 7): "By the year 2000, every school in America will be free of drugs and violence and will offer a disciplined environment conducive to learning." Many states have legislated extensively against youth violence, especially in the past five years, but these initiatives have rarely focused on schools. The states have generally failed to provide funding for the prevention of school-based violence and drug abuse. Meanwhile, pressures on budgets and other academic performance priorities have made it difficult for either schools or districts to implement prevention activities in the absence of targeted outside support.

It is little wonder, then, that teachers in our focus groups expressed doubts about the continuity of prevention programs at their schools. Even where state allocations to school districts remain reasonably stable, funds for specific programs are regarded as uncertain. As one teacher put it, "We're all in limbo: Are we getting it or are we not getting it? . . . People are asking can I do this next year or can't I do this next year?" This lack of confidence that programs will be funded for the following year undermines planning efforts and program continuity, which in turn must influence program effectiveness.

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[2]Formula-based allotment does have the virtue of keeping administrative costs low.

VAGUENESS OF PURPOSE AND GOALS

A fundamental problem identified by focus group and conference participants is a lack of clarity as to the SDFSCA program's goals. Beyond saying that the program should make schools safe and drug free—which is essentially an aspiration rather than a program goal—it is hard to articulate precisely what the program is intended to accomplish.

More specifically, focus group and conference participants found it difficult to see the practical connection between violence and drug abuse. They perceived problems associated with school violence as more pervasive and profound than those involving drug abuse. In their view, low-level violence (verbal abuse, bullying, intimidation, etc.) is widespread and has a serious but mostly hidden negative effect on educational endeavors. Outbreaks of horrifying lethal violence are totally disruptive, but they are rare and not clearly related to these day-to-day patterns. In contrast, illegal drugs are seen as causing problems for fewer students, and the problems are believed to occur more through transactions in or near schools than through use in schools per se. Few study participants see drugs as an important source of violence in their schools.

The federal government is unable to clarify this confusion through allocative priorities because it has no control over the allocation of funds among drug and violence prevention activities at the school-district level. Indeed, the federal government is unable even to identify how much money is going to these two activities. However, given the lack of any clear relationship between drug use and violence in schools, there may be no way that the federal (or state) government could set logically consistent priorities for dealing with both problems.

The federal government could, however, define goals more clearly. The Executive and Legislative branches have both had trouble figuring out what to do with the SDFSCA since its inception—that is, how to turn an aspiration into a program. The program is viewed at the local level as an opportunity to secure funding for a profusion of activities arguably related to drug and violence prevention but really addressing broader social and educational concerns about student behavior. Like most categorical grant programs, the SDFSCA pro-

gram is seen as an entitlement by its recipients, a perception that creates a major obstacle to change.

LACK OF PROGRAM EFFECTIVENESS

Although the focus group and conference participants saw SDFSCA moneys as supporting prevention activities that are important in many schools, they acknowledged that few systematic data support this belief. The issue of evaluation is a serious one, made more difficult by the ambiguity of program goals. As noted above, the small grants do not provide school districts with enough money to perform evaluations, so little evaluation is done.

It is only fair to state here that the ED has not been idle or negligent in the area of evaluation. The SDFSCA rules for local planning and proposal development, monitoring, and reporting are elaborate. However, by legislative design, the Department has little or no specific enforcement authority beyond that vested by the General Education Provisions Act. As a consequence, its regulatory transactions concern primarily issues of routine compliance (Silvia, Thorne, and Tashjian, 1997). The ED has produced a steady stream of surveys, evaluations, and program guidance intended to clarify and strengthen school programs. However, it has had minimal resources for these activities and has so far been able to provide little evidence of effectiveness, either for policy managers in government or for educators seeking programs for their schools. Monitors at the state level have done little more than process grant applications and ensure that paperwork regulations are complied with; site visits and other forms of review and assistance are rare; and evaluation efforts are actually decreasing.

In the absence of evaluations of school efforts, information on successful models would be helpful. However, the research base on both drug and violence prevention is too limited to provide more than general guidance to schools about what works. The scarcity of demonstrably effective alternatives is one reason for the great popularity of the DARE program, which has in fact demonstrated effec-

tiveness in only one of dozens of evaluations.[3] Its continued dominance of the market is largely attributable to strong advocacy by local police and support from parents and schools (Gottfredson, 1997). Other programs involving professional and peer counseling have had similarly disappointing evaluation results. A few drug prevention programs, such as Life Skills Training (Botvin et al., 1995) and RAND's Project ALERT (Ellickson, Bell, and McGuigan, 1993) have demonstrated efficacy but have not yet been widely adopted or proven effective in diverse settings. The 2001 report of the ED's Expert Panel on Safe and Drug-Free Schools corroborates this pattern of results, as discussed below. There is even less clarity in the research findings on violence prevention. Few evaluations were conducted before 1995, and only a few interventions have been assessed at all (Samples and Aber, 1998). Conference participants observed that the weakness of the existing knowledge base has inhibited school superintendents and other senior education officials from strongly advocating specific drug and violence prevention activities. There are no interventions behind which they can confidently stand.

As pointed out at the project conference, what little high-quality research has been conducted has focused on curricular interventions. This is consistent with the SDFSCA's historical emphasis on curriculum as the principal funded activity. However, many aspects of a school's activities contribute to the extent of violence and drug abuse, and not all of these can be addressed through formal curriculum. For example, classroom climate (i.e., how a teacher deals with individual students' difficulties or routine disputes among students) may be more important than targeted curricula or programs, but it is difficult to design a funding program that affects such "embedded" activities. As Hawkins, Farrington, and Catalano (1998, p. 210) concluded,

> Unfortunately, those concerned about youth violence often do not focus on changing the opportunity and reward structures of classrooms. . . . More typically, schools add a violence prevention curriculum, peer mediation or peer counseling program that seeks to deal with aggressive and violent behavior directly. While these

[3]DARE announced in February 2001 that it will undertake major programmatic changes in response to the negative evaluations.

programs show promise, they are only part of an effective strategy for violence prevention in schools.

The dearth of demonstrably successful models is not the only barrier to successful performance. For example, a study by the Research Triangle Institute reports that "student outcomes were better when prevention programs had greater stability over time, a definition that includes being in place for a long period, with continuity of staff, planning and leadership" (Silvia, Thorne, and Tashjian, 1997). Often, however, the local pattern has been one of inconsistent implementation. Teachers and counselors simply do not have enough time, support, training, or motivation to provide all the instruction or other services and activities that they plan (Silvia, Thorne, and Tashjian, 1997).

The teacher training issue is particularly important. Focus group and conference participants noted that most teachers have little or no preservice training in prevention of drug abuse or violence. Moreover, existing certification requirements and current demands for stronger preparation in academic areas make it unlikely that this situation will change anytime soon. Promoting incorporation of prevention training into teacher education is therefore one way in which the SDFSCA program could have an impact over the next decade. But any such strategy should be launched speedily, given the teacher turnover that will occur during that period. To date, this issue has received very little attention in legislative or program development.

LACK OF COORDINATION WITH OTHER PROGRAMS

Like many federal categorical programs in education as well as other areas, the SDFSCA program is "stove-piped." That is, there has been very little coordination or collaboration with other education programs (e.g., education for disadvantaged students or programs that support after-school activities) or with related programs in other areas such as juvenile justice or substance-abuse prevention. As a consequence, SDFSCA programs—at the federal, state, and local levels—are not planned for or operated as components of any broader strategic approach to preventing drug abuse and youth violence. To an even greater extent than other educational activities, school-based drug and violence prevention programs would benefit from

being integrated with related activities in mental health, youth development, juvenile justice, and substance-abuse treatment. Yet both the conference and the literature report few instances of systematic collaboration, either among the federal agencies or among the relevant agencies and institutions at the state or local level. It is somewhat encouraging, however, that several of the program's recent initiatives respond to this need (see below).

Equally important, the SDFSCA program has failed to link prevention activities to the educational reform movement. Schools are changing in fundamental ways that make stand-alone behavioral curricula more difficult to integrate into school programs. National educational goals have been promulgated, and standards-based reforms have been enacted in almost every state; they have also been incorporated into major federal programs such as Title I. The alignment of these standards with state and local curricula, professional development programs, and assessments is far advanced. Taken together, these initiatives have been the dominant feature of education policy for the past 15 years. Yet the SDFSCA program has remained isolated from this mainstream of school reform policymaking. Pursuit of the national goal of safe and drug-free schools has been largely unrelated to the pursuit of more prominent, substantive goals in areas such as reading and mathematics. Similarly, efforts to improve the implementation and performance of local SDFSCA programs have not been connected to broader school improvement and professional development strategies.

This lost opportunity is of considerable magnitude, both for those concerned about prevention and for those focused on school reform. It has been evident since the landmark Safe Schools Study of 1978 (Boesal, 1978) that the characteristics of schools dealing successfully with problems of safety and violence are virtually identical to those of schools successfully engaged in academic improvement. These characteristics include clear expectations of student performance, stable and fairly administered norms of behavior, consistent and cooperative patterns of teacher activity, and extensive communication and collaboration with families and the community. Yet there has been little federal or state encouragement or support for local initiatives that bring together the perspectives and resources of school reformers and prevention program developers. This lack of coordinative effort has been unfortunate for both.

Instead of synergy between such purposes, there has been competition. A basic finding of this analysis—which reflects observation, experts' comments, and research—is that, in general, schools do not readily embrace drug and violence prevention activities, even though they nominally support the goals of such activities. The argument that students require a drug-free and safe classroom in order to learn, though eminently reasonable, has not turned out to be programmatically persuasive in the ongoing competition with other educational priorities. Focus group participants reported that the growing pressure on schools to meet standards in core academic subjects has even further reduced schools' willingness to allocate time for activities related to drug-abuse and violence prevention.

In sum, then, the focus group participants saw the SDFSCA program as a categorical program trying awkwardly to deal with a deep, pervasive educational problem: the need to give students the strength and skill to eschew violence and drugs and succeed in school and in life. In the study participants' view, such behavioral issues must be integrally related to academic achievement, not dealt with on the side. Interventions should be truly preventive, rather than designed to deal after the fact with the breakdown of progress and development that violence and drug abuse represent.

RECENT PROGRAM IMPROVEMENTS

In recent years, the SDFSCA program has made important strides toward becoming more efficient and effective. It has developed new guidelines emphasizing the need for rigorous assessment, performance objectives, research-based program development, and systematic evaluation. It has helped create and implement a program, jointly sponsored by the ED, the Department of Health and Human Services, and the Department of Justice, that provides large comprehensive grants in approximately 75 districts, as well as a junior high school coordinator initiative. Both of these efforts resulted from recent evaluation findings. Finally, it has expanded its attempts to develop joint or coordinated efforts with such other ED programs as Title I and the new 21st Century Learning Centers program supporting expanded after-school activities. It is too soon to gauge the effectiveness of these recent efforts.

Another ED initiative may also prove beneficial to the SDFSCA program. As part of the move to strengthen the knowledge base available to schools, the Department has created an expert panel to identify programs that are effective in reducing drug use and violence.[4] The panel has asked program developers to submit candidates of two types: (1) classic curriculum offerings, such as DARE, Life Skills Training, or Project ALERT; and (2) a broader set of "policies or practices that maintain safe, disciplined and drug-free environments for students, staff and management" (U.S. Department of Education, Expert Panel on Safe, Disciplined, and Drug-Free Schools, 1999, p. 4). The panel published its first report in January 2001 (U.S. Department of Education, 2001). Of 132 programs it received to evaluate, the panel classified nine as exemplary and 33 as promising. It is worth noting that the most popular program, DARE, was not rated as either exemplary or promising. Of those deemed to be exemplary, only two target violence in school, two are specific to licit substances only (alcohol and tobacco), and all but two are school-based. Although the number of exemplary programs is distressingly small, the panel's work provides a basis for systematically upgrading prevention activities.

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[4]This is one of four such panels; the others focus on educational technology, gender equity, and mathematics and science education. Program developers are invited to present their products, along with outside evaluations, to the panels. Using specified criteria, the panels evaluate the programs, and those judged to be exemplary or promising will be disseminated broadly.

CHANGING THE PROGRAM

The SDFSCA program was developed in response to a crisis, without any articulated theory of how the response would work its way through the federal system and ameliorate that crisis. This situation persists—the program is related to its goals only at the rhetorical level. This chapter presents our criteria for an effective program, followed by an evaluation of the Clinton administration's proposal for program reform (the only detailed plan yet offered) and a set of directions that further reforms might take.

CRITERIA FOR A SUCCESSFUL PROGRAM

A redesigned SDFSCA program should be judged primarily in terms of the following six criteria:

- *Targeting of resources.* Does the program allocate an appropriately large share of the funds to schools with the most serious problems and few resources of their own?
- *Effectiveness in reducing drug use and violence in schools.* How much do the program's expenditures decrease students' use of drugs and violence in and around schools? Are funds being spent on proven program models that are effectively implemented?
- *Evaluability.* Can the federal government assess how effectively the money is being spent?
- *Accountability.* Can the federal government track what is being done with program funds? Can the Department of Education

determine the extent to which the programs it funds increase school safety and reduce violence and drug use?

- *Improvement of program capacity.* To what extent has the program increased the quality and range of available school interventions? Are new approaches encouraged? Does the program commission or carry out the research, evaluation, and data collection needed to strengthen programs for preventing drug abuse and violence? Does it support appropriate training of teachers and more-active leadership by senior educational officials?
- *Administrative feasibility and cost.* Are the requirements of the program compatible with the managerial and administrative capabilities of schools? How much must be spent by the schools and all levels of government to meet reporting and evaluation requirements? Do administrative costs at all levels of government remain low?

THE CLINTON ADMINISTRATION PROPOSAL

In August 1999, the Clinton administration announced its proposal for changing the structure of the SDFSCA program (McCaffrey, 1999). The proposal first acknowledges many of the criticisms of the current program, emphasizing that most of the problems cited are structural flaws in the existing legislation rather than implementation failures on the part of the ED. The proposal recommends that districts be required to produce substantive grant proposals and that states develop a formal evaluation process that includes comparisons of those proposals. The criteria to be used for awards include the level of risk of the school district's population and the district's fiscal capacity. The language of the proposal suggests that about half of all districts would receive awards.

This proposal, which calls for a competitive, targeted allocation process, should ensure that schools use only proven programs and should provide schools with strong incentives to implement these programs effectively. It should also do a better job of directing the funds to those students most in need of prevention programs. Finally, emphasis is given to the need to provide large enough grants to make a difference. With respect to our criteria for a successful pro-

gram, this proposal appears to rate highly in terms of accountability, evaluability, and potential program effectiveness. It also moderately improves targeting (see Table 1).

Table 1

Evaluation of the Clinton Administration Proposal

Criterion	Rating
Improves effectiveness	+
Better targets resources	?
Improves accountability	+
Promotes evaluability	+
Is administratively feasible, keeps costs low	–
Improves program capacity	0

The proposal clearly does less well in terms of administrative feasibility and cost. State governments will have to develop a proposal-evaluation capability, and the school districts will need to have new proposal-writing capabilities. Unless the competition is structured so that only a modest percentage of districts receive funds, the average grant will be too small to justify this process for most districts. At present, the median grant is barely $10,000; even if only one-third of the districts received grants under the proposed competitive process, most grants would still amount to less than $30,000. It would scarcely be worth the effort to prepare competitive proposals for such small grants or to conduct the required evaluations (which would also be a component of the proposed program). One-quarter to one-half of the total funds could be needed to cover administrative costs, including those of evaluation. If, alternatively, states concentrated their program funds among larger school districts with significant problems, evaluation and proposal preparation would require a much smaller share of the awards. However, decisions to concentrate funding at the state level are just as unlikely as are such decisions at the federal level.

The Clinton administration's proposal also places heavy reliance on the fragile research base discussed above. High-quality evaluations are few, and the initial work of the ED's expert panel to identify proven and promising programs encountered both substantive and procedural problems. The SDFSCA program is, for example, beset with conflict about the evidence in support of DARE, yet it would be

politically foolhardy to suggest a program design requiring many, if not most, districts to give up a curricular approach with such strong support from parents and police. Also, as discussed above, it is inherently particularly difficult to evaluate those dispersed features of school management and activity that influence school safety and drug use. It is likely that the programs that are easiest to evaluate will most readily pass muster (Gottfredson, 1997).

Finally, the Clinton administration's proposal does not contain the building blocks for systematic long-term program improvement. Most major federal programs in education and other policy areas supplement their formula grant programs with an array of capacity-building activities, e.g., in programmatic research, demonstration, teacher preparation, and evaluation. Until recently, the SDFSCA program has had no such capacity for improvement, and it still has very little. The program provides no money for teacher training or research, nor is such authority included in the Clinton administration's proposal.[1] Little use has been made of the ED's general authority for research (the Office for Educational Research and Improvement) or for program management and evaluation (the General Education Provisions Act) to improve the SDFSCA program. These authorities reserve no resources for the program, and they make no provisions for coordination among research, training, and operational support for it.

DEVISING ALTERNATIVES

Given that the Clinton administration's proposal, while an improvement, is insufficient, what further action might be taken? One option would be to abandon the SDFSCA program in its present form. Should it be limited to violence prevention? That seems more related to schools' core mission of providing effective education than does drug prevention. But the history of the program, rooted in the crack crisis and sustained by the continuing "War on Drugs," keeps the focus on drugs. Political gridlock within and among the levels and

[1]The National Institute on Drug Abuse and the Center for Substance Abuse Prevention fund research on drug prevention; the National Institute on Mental Health and the Office for Juvenile Justice and Delinquency Prevention fund research on violence prevention.

branches of government may ensure maintenance of the status quo. In this light, given its inattention to coordination and accountability and the lack of evidence of its effectiveness, the SDFSCA program seems fundamentally irremediable.

The argument in favor of abandoning the SDFSCA program, however, is based only on the politics of the program's origin and continuation. The argument may indeed be persuasive, but signs of progress in the program call for serious consideration of its retention. Steps in the right direction include increased collaboration with other federal programs aimed at helping youth with a variety of behavioral problems and a new focus on the middle school. That the political climate may be changing is also suggested by congressional willingness to give a larger share of funds to federally controlled discretionary programs. The SDFSCA program's long-time, politically driven block-grant character may be gradually superseded by genuine expectations and requirements for targeted, effective action.

If continuation is judged desirable, reform should go beyond the steps proposed by the Clinton administration.[2] The criteria listed at the beginning of this chapter suggest three major dimensions of change: the way funds are allocated within states (assuming that interstate allocations are not likely to change[3]), the means by which the federal government enhances the content of programs, and the methods by which program performance is judged.

Funding Formulas

There are several ways that allocation protocols could be revised to further the Act's purposes:

- To enhance quality and allow more demonstration programs, more discretion could be shifted to the ED. Although Congress did provide the Department substantially more discretionary

[2]The Bush administration's proposal for reform of the SDFSCA program suggests performance-based grants, but only in the most general fashion.

[3]Congress could attempt to improve targeting across states to take account of differences in state problems and resources, as it does with the Substance Abuse and Mental Health Block Grant. Such formulas require large quantities of data, however, as well as political courage (Burnam et al., 1997).

funds in 1999 ($80 million out of $550 million), the program remains primarily formula driven.

- A formula could be used that assures that schools serving poor communities and enrolling children at higher victimization risk receive substantially higher per-pupil awards.
- A minimum grant size could be established, thus excluding or redirecting some district efforts.
- Matching or other requirements for state and local contributions could be implemented.
- A competitive grant process within states could be required.

These alternatives are not mutually exclusive. For example, a higher share of appropriations could be set aside for federal discretionary grants, with the remaining moneys being used to fund state-run competitive grants in which district or student needs play a role. A requirement for matching funds would expand targeted resources at both the state and the local level. If some small districts no longer qualified for awards because of a grant minimum, they could be encouraged (as they have been by the Federal Vocational Education program since 1994) to form consortia of small districts; such consortia are already permitted and used by some districts (U.S. Department of Education, 1994). Alternatively, small districts that succeed in presenting evidence of proven effectiveness in their use of SDFSCA funds could be exempted from newly established minimums.

Determining Content

Three general strategies could be used to enhance the content of programs. They are listed here in descending order of coerciveness:

- Acceptable approaches could be listed, and funds could be limited to those on the list.
- Performance standards could be set, with the means by which these are achieved left to the school districts.

- Guidelines could be provided and information disseminated to schools, with the choice of funded activity left entirely to the districts and schools.

These options reflect differing views about the relative competence of different levels of government to make these kinds of decisions. The first option, centralizing the listing of acceptable programs, creates a bureaucratic process that may stifle innovation but assures a minimum level of quality. The second option sets performance standards, but such standards are difficult to enforce, given the complexity and expense of outcome measurement. However, if combined with requirements for regular public release of state and local results, performance standards might build popular pressure for improvement. The third option, providing guidelines, is close to the status quo and is perceived to have been generally ineffective, perhaps because the guidelines have seldom been monitored. A basic problem with all of these choices is that each assumes a level of reliable knowledge that is not currently in view.

Evaluation

Accountability is a concern throughout the federal government. It refers to the ability to show not merely that funds have been properly spent but that they have accomplished worthwhile results. Evaluation can be carried out in a variety of fashions ranging from assessment of the performance of each individual grant (to assure that funds were spent appropriately) to review of the overall national performance of the program. Evaluation also can be used for a number of purposes, including learning what works, rewarding high-performing grantees, and assessing the returns on investment of public moneys.

Formal evaluation of individual SDFSCA grants could be particularly challenging. It could, for example, require that schools conduct surveys of alcohol, tobacco, and drug use, as well as develop indicators for the levels of violence in the community. Defining and measuring the many subtle program influences and outcomes would require considerable sophistication and expense.

CONCLUSIONS AND RECOMMENDATIONS

BROAD ASPECTS REQUIRING FURTHER ATTENTION

The Clinton administration's legislative proposal deals realistically with several of the SDFSCA program's problems and opportunities for improvement. Steps in the right direction include provisions for targeting, state review of competitive grants, and collaboration in both demonstration grants and local proposal development. However, we believe that these recommendations could be made more systematic and ambitious. Drawing from observations on the design and redesign of similar federal education programs for improved performance, we suggest two broad aspects of the SDFSCA program that require further attention: the program's mission and its allocation philosophy.

Program Mission

The SDFSCA program's mission and purposes are largely historical and political. The program does not share the direct equal-educational-opportunity purposes of such programs as Title I or the Individuals with Disabilities programs, nor does it share the economic-development purpose of vocational education. It was created, rather, as the school-based segment of a larger national campaign against drug use and abuse, with little reference to other educational programs or priorities.

The SDFSCA program is a large one in the context of federal spending on K–12 education. It is one of the largest ED programs and the

largest started since the creation of such major programs as those created by the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA). Through a congeries of small categorical programs, the Department provides funding for almost every form of educational activity that occurs in most school districts, but the funding is typically at token levels, intended to provide endorsement and symbolic leadership. At $550 million to $600 million per year, the SDFSCA level of funding transcends symbolism. The program should have specific, measurable objectives for every level of government and the means to ensure that they are being achieved. The program's political significance should be reflected in the Department's national leadership ("bully pulpit") actions. Where the ED has taken emerging national concerns seriously, in such disparate arenas as nationwide standards and assessments, reading improvement, and religious expression in public schools, it has been effective at mobilizing dialogue and highlighting consensus for initiative. The ED could develop such a campaign around themes of drug and violence prevention and thus augment the work of the SDFSCA program.

The combination of drug-abuse and violence prevention missions in a single program should also be reconsidered. These two problems are not clearly related in either cause or cure. The assumptions about common antecedents are probably incorrect: Much violence is rooted in family and community problems, independent of drug use or distribution. Moreover, even if drug abuse and violence share common roots or strong connections, the solutions to the two problems may require different approaches. For example, drug use may best be addressed through specific curricula, and violence through classroom climate changes and disciplinary policies.

At every level, program managers make decisions about whether to emphasize drug-abuse or violence prevention, resulting in arbitrary patterns of activity and resource allocation. Currently, drug prevention is reported to be losing resources to violence prevention and safety programs in this zero-sum process—not an intended outcome. It is worth considering whether the two purposes should be separated, either within the SDFSCA program or by dropping violence prevention from the program and creating a companion program.

Allocation Philosophy

The problems encountered in the operation of the SDFSCA program are not unique in either the federal government or the ED. Modern federalism is broadly concerned with distributing federal moneys to lower-level government units for the purpose of ensuring that good programs are implemented effectively and that those units most in need of services get the most funding. This ambition has only been made more urgent by the passage of the Government Performance Review Act (GPRA). Most federal programs overlap with other federal programs, and coordination is difficult to achieve. The high cost of evaluation and the weakness of the research base in the prevention field accentuate the difficulty of assuring effective local activities, but these problems are not outside the range of other federal program experience.

Other major education programs sharing some of these features have gradually developed adequate allocation mechanisms. For example, the Federal Vocational Education program[1] disburses relatively large sums ($1.15 billion in 1999) to improve the workforce skills of young persons entering the labor market.[2] Long criticized for an allocation formula that disbursed moneys too broadly and failed to reward performance, the legislation was amended in 1990 to allow for more-targeted expenditures (U.S. Department of Education, 1994). Fewer schools now receive larger sums of money, and the schools that do are more likely to be in poorer districts and to serve students who need and can benefit from vocational education. Small school districts are encouraged to form consortia for purposes of proposal submission.

One important lesson from the reform of the Perkins Act is that it is possible to restructure a program that has previously been treated as a school or organizational entitlement. Such restructuring may take time—several reauthorizations and mandated national evaluations

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[1]Currently authorized by the Carl D. Perkins Vocational-Technical Education Act Amendments of 1998 (P.L. 105-332).

[2]Furthermore, in a notable historical parallel, the 1917 Smith-Hughes Act virtually created the field of vocational education, much as the SDFSCA aspires to create a prevention field.

from 1963 to 1994 were required in the case of vocational education—but it can be done, politically and programmatically.

RECOMMENDATIONS

On the basis of the preceding perspectives and our proposed criteria, we believe the following three alternative avenues for change would each remedy the SDFSCA program's problems at least as well as the changes proposed by the Clinton administration. These changes seem compatible with the Bush administration's objectives as well.

1. *Change the within-state allocation formula to give much more weight to need and capacity of districts.* Districts or consortia of small, low-need districts would apply for state grants. States would pass the funds through to eligible grantees noncompetitively. Grants would meet or exceed a minimum level of dollars per student (or school) to ensure that schools could implement meaningful programs. Not all funded programs would be evaluated, but a sample would periodically be chosen for evaluation.

2. *Change the basic character of the program, replacing formula grants to states with direct federal grants.* Grants would be given to a much smaller number of school districts, which would serve as models for others in the nation. This approach has been adopted by other federal education programs, such as the program for educational technology and, to a considerable extent, the bilingual education program. The problems of violence and drug use among school children are so pervasive that the approximately $600 million in SDFSCA funds can account for only a small share of the total resources needed. By making the SDFSCA program a demonstration program, Congress would be recognizing the distinctive role and capacity of the federal government in demonstrating models that states and localities could adopt and fund.

3. *Create requirements for state and local efforts.* The SDFSCA program could offer matching grants, as is done for vocational education, or require a comprehensive state-funded program as a condition for federal contribution, as is done for IDEA. In both of these cases, state and local contributions have secured support for program goals, surpassed the federal contribution several times over, and created nearly universal opportunities for students with needs

addressed by the programs. Only substantially increased state and local efforts could possibly enable total governmental resources to cover all serious needs.

For any of these three alternatives, the federal government must furnish the SDFSCA program with an array of capacity-building authorities. The program should designate funds for research to be carried out through the ED's Office of Educational Research and Improvement or through other agencies such as the National Institute on Drug Abuse or the National Institute of Justice. The program should also have the authority to make sustained investments in training activities for both new and experienced teachers. Comprehensive national evaluations should be scheduled to provide the federal government with reliable information about program successes and problems, timed to contribute to deliberations concerning reauthorization.[3]

Finally, considering the lack of communication and coordination among programs and levels of government, the Department should take the lead in regularly convening federal, state, and local officials for the explicit purpose of enhancing collaboration among *all* related school-based prevention programs, not just those supported by the SDFSCA program.

CONCLUDING COMMENT

The current SDFSCA program structure is almost universally considered to be profoundly flawed; we are unaware of anyone who will explicitly defend it. However, the problems addressed by the program are so serious and widespread that the federal government cannot reasonably abandon its commitment. Unfortunately, there are few proposals for reform. The Clinton administration's proposal addresses some but not all of the ways in which the program could be improved. If the SDFSCA program is to survive and flourish, it must become more demonstrably effective at reducing school-related drug use and violence.

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[3]The SDFSCA program might be an ideal candidate for experimentation with interactive, Internet-based schemes for program monitoring and assessment.

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This report synthesizes the findings of a review of the structure and performance of the Safe and Drug-Free Schools and Communities Act (SDFSCA) and assesses options for reforming it. The Act provides for a $600-million-per-year program of grants to states, which pass the money on to school districts for programs aimed at reducing school violence and drug abuse. However, the formula by which money is disbursed does not focus on the schools most in need of help, and it spreads the money too thinly. Moreover, the guidelines for expenditure permit schools to use the funds for programs that are unproven, and the legislation gives the federal government limited ability to foster effective programs. The SDFSCA program has not been credibly evaluated, but it is widely thought to have accomplished little. Yet the problems it addresses are so serious and widespread that the federal government cannot reasonably afford to abandon its commitment. Few proposals for reform have been offered; the one detailed proposal moves in the right direction but addresses only some of the ways in which the program could be improved. This report suggests criteria for judging reform options and presents ways in which the proposal under discussion could be strengthened.

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